

## **REMARKS/ARGUMENTS:**

This Amendment and the following remarks are intended to fully respond to the Final Office Action mailed June 4, 2007. In that Office Action claims 1, 3-13, and 15-18 were examined, and all claims were rejected. More specifically, claims 1, 3-6, and 8 were rejected under 35 U.S.C. § 102(e) as being anticipated by Bushe et al., U.S. Patent No. 6,978,422; claims 9-13, 15, 16, and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bushe et al. in view of Lynch et al., U.S. Patent No. 6,558,431; claim 7 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bushe et al. in view of Hanggie et al., U.S. Patent Application US2003/0231204 A1; and claim 17 was rejected under 35 U.S.C. § 103(a), as being unpatentable over Bushe et al. in view of Lynch et al. and further in view of Hanggie et al. Please add new claims 19 which finds support throughout the written description. Claims 1, 3-13, and 15-19 remain in the application. In this Response, claims 1 and 9 have been amended. Claims 3-8, 10-13, and 15-19 remain in their original form. No new matter has been introduced through any of these claim amendments.

### **Interview Summary**

Applicant would like to thank Examiner Salomon and his SPE for the telephone interview that was held on June 27, 2007. A summary of the meeting is as follows:

Proposed amended claims 1 and 9, which were sent to Examiner Salomon via email prior to the telephone interview, were discussed. No agreement was reached on the amended claims. Examiner Salomon stated that the claim amendments might require a new search. Attorney for Applicant indicated that the amended claims would be submitted in an amendment after final, and if a new search was required, Attorney for Applicant indicated that filing a Request for Continued Examination would be considered.

Applicant does not believe that the amendments made to the claims will require a new search, as all of the claim elements in the amended claims have appeared either in the original claims, or in the claims as amended by Applicant in response to the first office action. The

Examiner has cited what he has determined to be the most relevant prior art in the first office action, and in response to Applicant's amended claims, in the final office action as well.

**A. Rejection of Claims**  
**Under 35 U.S.C. § 102(e)**

**Items 3 and 4 In The Office Action**

The Examiner has rejected claims 1, 3-6, 8 under 35 U.S.C. §102(e) as being anticipated by Bushe et al., U.S. Patent No. 6,978,422.

In response, Applicant has amended independent claim 1 to more distinctly distinguish Applicant's invention.

**Claim 1 Further Limitations**

“a user interface element factory having additional user interface elements;  
a layout engine for adding one or more of the additional user interface elements to the visual tree after the appropriate visual style definition has been bound to the one or more data fields; and  
a rendering engine which uses the visual tree passed to the layout engine to render the data for display.”

Support for these amendments may be found in the specification on page 3, lines 4-9; page 7, lines 4-7; page 12, lines 24-29; page 15, line 28 through page 16, line 3; page 17, lines 21-24; page 22, lines 14-19; and in reference to FIGS. 3 and 6.

Applicant's amended claim 1 has:

“a style definition module for holding one or more visual style definitions”

and as *separate* and *distinct* elements:

“a user interface element factory having additional user interface elements;”

“a layout engine for adding one or more of the additional user interface elements to the visual tree after the appropriate visual style definition has been bound to the one or more data fields;” and

“a rendering engine which uses the visual tree passed to the layout engine to render the data for display.”

The Examiner asserts that these separate and distinct claim elements are taught by Bushe et al. at col. 9, lines 13-24: “as additional *managed resources* become available for management by a resource management application.” However, a close examination of this portion of Bushe et al. does not support the assertion. Reading further in the same paragraph, Bushe et al. states that “the *data dictionary* can be updated with new managed object definitions that represent such *managed resources*.” Bushe et al. has only one structure or element (Data Dictionary **123**) for storing information on managed resources for displaying on a Display **127**. That information includes View Definitions **132**, Object Definitions **133**, and Object Data **134** (see **FIG. 1** in the specification). In order for Bushe et al. to be able to display any information about a managed resource, that information has be added to Data Dictionary **123**: “the process **121** operates to obtain and access the data dictionary **123** to display a master view **128** in the graphical user interface **129** on the display **127**. The master view **128** includes one or more user selectable tasks **116** and one or more user selectable managed objects **117**.” (col. 10, lines 50-54). Bushe et al. does not have separate structures or elements where, after a visual style has been bound to one or more data fields from a style definition module **310**, that *additional* user interface elements in a *separate structure* (user interface element factory **324**, **FIG. 3** in the specification) are added by a layout engine **322** and then rendered by a rendering engine **320**. All of these structures or elements and functions are claimed in amended claim 1. Bushe et al. is limited in that before a managed resource can be displayed, it must be first added to Data Dictionary **123**. Then, when a call is made to display information on the managed resource, the Data Dictionary **123**, and *only* the Data Dictionary **123**, is called to apply the “style” (View Definitions **132**, Object Definitions **133**, and Object Data **134**, **FIG. 3** in the specification) for rendering on Display **127**. A close comparison of Applicant’s **FIG. 3** and **FIG. 1** from Bushe et al. make these differences in structure and function quite clear. As claimed by Applicant in amended claim 1, when a call is made to render an object, visual styles are bound to the data, and a visual tree is constructed.

After the visual tree is constructed, a rendering can be made directly. But in addition, the visual tree may be passed first to a layout engine 322 that adds more information to the visual tree, using user interface elements from factory 324 to complete the tree. (see page 12, lines 21-29 in the specification). It is not possible for Bushe et al. to perform this function as Bushe et al. has no structure or methods to do so.

Bushe et al. does not teach or disclose a separate user interface element factory 324 (page 12, lines 24-29 in the specification), which is in addition to the style definitions module 310 (page 10, lines 12-20 in the specification) disclosed by Applicant. The separate user interface element factory 324 allows additional user interface elements to be applied to the data *after the stored style definitions have already been applied*. These additional user interface elements are applied through a *separate layout engine 322* (page 12, lines 24-29 in the specification) which is different and distinct from the rendering engine 320 (page 12, lines 21-24 in the specification). Bushe et al. does not teach or suggest this added functionality, which essentially is a *post processing operation performed after style definitions have been applied*, and can be used to “determine where to place certain display items and how large to make them relative to the physical characteristics of a particular computer system” (see page 12, lines 27-29 in the specification).

Applicant submits therefore that Bushe et al. does not teach nor suggest these additional limitations. Since the Bushe et al. reference does not disclose expressly or inherently *all* of the elements and limitations of Applicant’s amended claim 1, Applicant believes that claim 1 is not anticipated by Bushe et al., and Applicant requests withdrawal of the Examiner’s rejection to this claim under 35 U.S.C. §102(e).

Claims 3-6 and 8 depend directly or indirectly from independent claim 1 and include all the elements and limitations thereof. As a result, and in light of the foregoing remarks concerning independent claim 1, Applicant likewise believes that claims 3-6 and 8 also overcome the Examiner’s rejection based on Bushe et al. under 35 U.S.C. §102(e), and withdrawal of that rejection in respect to these claims is also respectfully requested.

**C. Rejection of Claims**  
**Under 35 U.S.C. § 103(a)**

Items 5 and 6 In The Office Action

The Examiner has rejected claims 9-13, 15-16, and 18 under 35 U.S.C. §103(a) as being unpatentable over Bushe et al. in view of Lynch et al., U.S. Patent No. 6,558,431.

In response, Applicant has amended independent claim 9 to more distinctly distinguish Applicant's invention.

**Claim 9 Further Limitations**

“adding additional user interface elements to the visual tree after the properties in the visual tree have been bound to the one or more data items; and rendering the display based on the visual tree having the additional user interface elements.”

Support for these amendments may be found in the specification on page 3, lines 4-9; page 7, lines 4-7; page 12, lines 24-29; page 15, line 28 through page 16, line 3; page 17, lines 21-24; page 22, lines 14-19; and in reference to FIGS. 3 and 6.

The amendment made to claim 9 parallels that which was made to claim 1, and Applicant repeats the arguments above in reference to claim 1 as applicable to claim 9 in that Bushe et al. does not teach nor suggest these additional limitations. Lynch et al. also does not disclose or teach the additional limitations of **adding** additional user interface elements to the visual tree **after** the properties in the visual tree have been bound to the one or more data items, and rendering the visual tree with the additional user interface elements.

**FIG. 7** in Lynch et al. discloses an inventive Editor **700** which processes an input HTML Document **701**, which is read and interpreted by Parser **702**. Parser **702** forms the Internal Tree **704** from the HTML Document **701**. The Renderer **705** uses the Document Tree **704** to form a screen display page, which may be edited via user interface elements in Box **712**. (*see* col. 4, lines 40-53). **FIG. 8** in Lynch et al. shows that the Parser **702** reads the HTML Document **801** and forms a Tree **802**. Stored in the Node **803** is Format Information **804**, which relates to the format of the HTML source document. The Information of Node **803** and Format Information **804** is used by the Renderer **705** in the formation of the rendered view. The Format Information **804** is formed by the Parser **702**. (*see* col. 6, line 61 through col. 7, line 13). As was shown with

respect to Bushe et al., Lynch et al. also does not add additional user interface elements after the visual tree has been populated with format data, nor does Lynch et al. have the structure to accomplish this.

Applicant submits therefore that Lynch et al. does not teach nor suggest these additional limitations. Therefore, combining Lynch et al. with the teaching of Bushe et al. cannot arrive at Applicant's claimed invention as embodied in independent claim 9. Applicant thus believes that independent claim 9 now overcomes the Examiner's rejection based on Bushe et al. in view of Lynch et al., and withdrawal of that rejection under 35 U.S.C. §103(a) to this claim is respectfully requested.

Claims 10-13, 15, 16, and 18 depend directly or indirectly from independent claim 9 and include all the elements and limitations thereof. As a result, and in light of the foregoing remarks concerning independent claim 9, Applicant likewise believes that claims 10-13, 15, 16, and 18 also overcome the Examiner's rejection based on Bushe et al. in view of Lynch et al. under 35 U.S.C. §103(a), and withdrawal of that rejection in respect to these claims is also respectfully requested.

#### Item 7 In The Office Action

The Examiner has rejected claim 7 under 35 U.S.C. §103(a) as being unpatentable over Bushe et al. in view of Hanggie et al., U.S. Patent Application US2003/0231204 A1.

Applicant respectfully traverses. Claim 7, through dependency, embodies all of the elements and limitations of independent claim 1. Applicant has amended independent claim 1 as described above in Section B to remove Bushe et al. as anticipatory prior art under 35 U.S.C. §102(e). As argued above, Applicant believes that Bushe et al. does not teach or suggest all the elements and limitations of Applicant's independent claim 1. Therefore, combining Hanggie et al. with the teaching of Bushe et al. would not arrive at Applicant's claimed invention. Thus, Applicant believes that dependent claim 7 is patentable over Bushe et al. in view of Hanggie et al. Accordingly, Applicant requests retraction of the Examiner's rejection of claim 7 under 35 U.S.C. §103(a).

#### Item 8 In The Office Action

The Examiner has rejected claim 17 under 35 U.S.C. §103(a) as being unpatentable over Bushe et al. in view of Lynch et al., and further in view of Haggie et al.

Applicant respectfully traverses. Claim 17, through dependency, embodies all of the elements and limitations of independent claim 9. Applicant has amended independent claim 9 as described above in Section C to remove the combination of Bushe et al. and Lynch et al. as being obvious under 35 U.S.C. §103(a). As argued above, Applicant believes that Bushe et al. in combination with Lynch et al. does not render claim 9 obvious. Therefore, combining Haggie et al. with the teaching of Bushe et al. and Lynch et al. would not arrive at Applicant's claimed invention in claim 17. Thus, Applicant believes that dependent claim 17 is patentable over Bushe et al. in view of Lynch et al. and further in view of Haggie et al. Accordingly, Applicant requests retraction of the Examiner's rejection of claim 17 under 35 U.S.C. §103(a).

**CONCLUSION:**

This Amendment fully responds to the Office Action mailed on June 4, 2007. Still, that Office Action may contain arguments and rejections that are not directly addressed by this Amendment due to the fact that they are rendered moot in light of the preceding arguments in favor of patentability. Hence, failure of this Amendment to directly address an argument raised in the Office Action should not be taken as an indication that the Applicant believes the argument has merit. Furthermore, the claims of the present application may include other elements, not discussed in this Amendment, which are not shown, taught, or otherwise suggested by the art of record. Accordingly, the preceding arguments in favor of patentability are advanced without prejudice to other bases of patentability.

Thus, a bona-fide attempt has been made to ensure that the application meets all statutory requirements and is in condition for allowance. The Examiner's early indication to that effect is, therefore, courteously solicited.

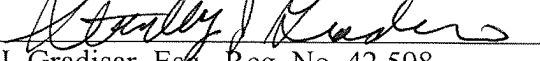
It is believed that no further fees are due with this Response. However, the Commissioner is hereby authorized to charge any deficiencies or credit any overpayment with respect to this patent application to deposit account number 13-2725.

In light of the above remarks and amendments, it is believed that the application is now in condition for allowance and such action is respectfully requested. Should any additional issues need to be resolved, the Examiner is requested to telephone the undersigned to attempt to resolve those issues.

If a telephone conference would expedite allowance or resolve any additional questions, such a call is invited at the Examiner's convenience.

Respectfully submitted,

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Date: August 3, 2007

